

FILED

NOV 04 2014

Phil Lombardi, Clerk
U.S. DISTRICT COURT

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**JUAN PABLO CHARRE,
ALEJANDRO CABRERA CHARRE,**

Defendants.

Case No. **14 CR 184 GKF**

INDICTMENT

[COUNT 1: 21 U.S.C. §§ 846 and

841(b)(1)(A)(viii) - Drug Conspiracy;

COUNT 2: 21 U.S.C. §§ 841(a)(1) and

841(b)(1)(A)(viii) - Possession of

Methamphetamine With Intent to

Distribute; Forfeiture Allegation: 21

U.S.C. § 853(a) - Drug Forfeiture]

THE GRAND JURY CHARGES:

COUNT ONE

[21 U.S.C. §§ 846 and 841(b)(1)(A)(viii)]

Beginning at least as early as sometime in or about October 2014, a more certain date being unknown to the Grand Jury, and continuing thereafter to the date of this Indictment, in the Northern District of Oklahoma and elsewhere, the defendants, **JUAN PABLO CHARRE** and **ALEJANDRO CABRERA CHARRE**, did knowingly, willfully, and intentionally conspire, confederate, and agree together, each with the other, to commit offenses in violation of Title 21, United States Code, Sections 841(a)(1), as follows:

1. To possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance; and

2. To distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A)(viii).

COUNT TWO
[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii)]

On or about October 18, 2014, in the Northern District of Oklahoma, the defendants, **JUAN PABLO CHARRE** and **ALEJANDRO CABRERA CHARRE**, did knowingly and intentionally possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

FORFEITURE ALLEGATION
[21 U.S.C. § 853(a)]

The allegations contained in Counts One and Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a).

Upon conviction of the conspiracy and methamphetamine offense alleged in Counts One and Two of this Indictment, as part of their sentence, the defendants, **JUAN PABLO CHARRE** and **ALEJANDRO CABRERA CHARRE**, shall forfeit to the United States any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offenses, including, but not limited to:

MONEY JUDGMENT

A sum of money in an amount of at least \$46,000 representing proceeds obtained as a result of the conspiracy and methamphetamine offense for which the defendants are jointly and severally liable, and any property used, or intended to be used, to facilitate the offenses, including the value of the drugs.


UNITED STATES CURRENCY

Approximately \$800 in United States Currency seized on or about October 18, 2014.

All pursuant to Title 21, United States Code, Section 853(a).

DANNY C. WILLIAMS, SR.
UNITED STATES ATTORNEY

A TRUE BILL



NEAL C. HONG
Assistant United States Attorney

/s/ GJ Foreperson

Grand Jury Foreperson